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VIA ELECTRONIC MAIL ONLY
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Re: Defendant's Discovery Deficiencies

Counsel:

We write today to point out deficiencies in your clients' discovery responses. Specifically we would point out as follows:

Generally:

As previously requested, if you claim privilege to any document—it should be listed on a privilege log provided to us. Please provide.

Request for Production No. 2:

Statements made about this lawsuit or the factual allegations contained therein are very relevant to this case. This objection is not made in good faith.

Please explain how you determined what documents were in fact “relevant”. Additionally, responsive documents do not have to be relevant, per se, to be discoverable. Defendant is required to produce responsive materials that are reasonably calculated to lead to admissible evidence or the discovery of admissible evidence. Fed. R. Civ. Pro. 26(b)(1). Thus, any document that could reasonably lead to admissible evidence or the discovery of admissible evidence is responsive to this request.

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Request for Production no. 4:

Please respond to the request as written, the request is not unclear. Please answer as required pursuant to the rules.

Request for Production No. 5:

The request is clear, and requests any document signed or filled out by Plaintiff in your possession. Please provide such responsive documents immediately.

Request for Production Nos 6-7:

You produced no documents related to this request although you have stated you will be instead only producing what you feel like producing: please respond to the request as written. Further, please identify how you determined relevance as to these documents.

Request for Production Nos. 8-11:

The request is clear as written. Please respond accordingly. As stated above, irrelevant documents are not per se undiscoverable. If privilege is claimed, then please provide privilege log.

Sincerely,

**THE EMPLOYMENT AND
CONSUMER LAW GROUP**

Jonathan Street